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**From:** Cohen, Lori  
**Sent:** Tue 11/25/2014 10:12:49 PM  
**Subject:** PH FS process question

Jim –

Thanks again for joining us yesterday at the Portland Harbor meeting. It was really helpful to have you there – both symbolically to show HQs engagement in the PH process as well as substantively, as your comments definitely added to the conversation. Folks were listening closely to every word....

As you know, one thing we are working on with the LWG is a way to make our FS review process more efficient. We are still planning to give the LWG sections of the FS to review and comment on... where can come to consensus that will be great, where we have differences the LWG will be able to dispute after we direct them to make the final changes to the end of the FS.

We are planning two significant changes to our process with the LWG that I would like you to be aware of:

- 1- The LWG will have draft final chapters of the FS prior to NRRB/CSTAG review, however, we are planning to change our current process in which the FS would be finalized *before* NRRB/CSTAG review to finalizing the FS *after* the NRRB/CSTAG review. This will give us time to modify the FS if needed to accommodate recommendations from the NRRB/CSTAG review.
- 2- After these modifications, we would direct the LWG to modify and produce the final FS, at which point the LWG has its right to dispute under the AOC. This is a change from our current process because currently the LWG can dispute section by section; this is problematic because the LWG cannot see how technical issues play out the entire analysis, and whether they are significant enough to dispute.

The reason for this message is to alert you to the modifications we are discussing with the LWG

and to work out a timeline for EPA's NRRB/CSTAG review and comment. We expect the NRRB /CSTAG comments to be delivered to the region within 60 days of the review – I would like to confirm that NRRB/CSTAG agree this is enough time for this before we commit in writing. I think we typically see draft comments in advance and have an opportunity to discuss with you – so this 60 days incorporates that back and forth. Please let me know if this works for you.

You may be travelling so I am sending this to the cc list so folks can start thinking about it.

Thanks!

Lori